

EXHIBIT A

Langloss, Kent (LAW)

From: Feller, Andrea (Law)
Sent: Thursday, November 14, 2019 11:07 AM
To: 'Matthew Berman'; Brian Markowitz
Cc: Adler, Michael (Law); Matthew Trauner; Mtrauner@milbermakris.Com; Robert J. Valli, Jr; Ryan Thompson; Simkin, Alexander; Weiner, Gregg; Wofford, Keith H.; Yolande Nicholson; Langloss, Kent (LAW)
Subject: RE: Dorce v. City of New York, Civil Action No. 1:19-cv-02216-DAB

Matthew, et al., Kent and I can be available for the conference you propose by telephone on Nov. 21, 22 or 26, at various times depending on everyone's availability.

Please note that our participation is not a waiver of the City's claim of lack of subject matter jurisdiction nor the relevance or propriety of your proposed discovery nor that discovery is appropriate or proper at this juncture. Additionally, we note that we are proceeding on your representation that the document requests and interrogatories have not been "served" and that you mailed and emailed courtesy copies only.

Please include my colleague Kent Langloss, copied here, in future emails.

Andrea B. Feller, Senior Counsel
New York City Law Department
100 Church Street, Room 3-250
New York, NY 10007
212-356-2565

From: Matthew Berman [mailto:mberman@vkvlawyers.com]
Sent: Friday, November 08, 2019 2:49 PM
To: Brian Markowitz
Cc: Feller, Andrea (Law); Adler, Michael (Law); Matthew Trauner; Mtrauner@milbermakris.Com; Robert J. Valli, Jr; Ryan Thompson; Simkin, Alexander; Weiner, Gregg; Wofford, Keith H.; Yolande Nicholson
Subject: Re: Dorce v. City of New York, Civil Action No. 1:19-cv-02216-DAB

Counselor,

Pendency of a MTD doesn't generally excuse parties from participation in the FRCP 26(f) conference, and the discovery requests were provided (as contrasted with "served") in order to have meaningful discussions therein. Please let us know your availability for the discovery conference as we requested.

Thank you.

On Fri, Nov 8, 2019 at 2:40 PM Brian Markowitz <bmarkowitz@goldsteinhall.com> wrote:

Counselor, given the pendency of the Motions to dismiss which challenge the very jurisdiction of the Court in this case, your discovery requests are hereby rejected at the present time by the TPT Defendants.



Brian J. Markowitz

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From: Simkin, Alexander <Alexander.Simkin@ropesgray.com>

Sent: Friday, November 8, 2019 2:28 PM

To: Afeller@law.Nyc.Gov; Madler@law.Nyc.Gov; Brian Markowitz <bmarkowitz@goldsteinhall.com>; Mtrauner@milbermakris.Com

Cc: Wofford, Keith H. <Keith.Wofford@ropesgray.com>; Weiner, Gregg <Gregg.Weiner@ropesgray.com>; Matthew Berman <mberman@vkvlawyers.com>; Robert J. Valli, Jr <rvalli@vkvlawyers.com>; Yolande Nicholson <attorneynicholson@gmail.com>

Subject: Dorce v. City of New York, Civil Action No. 1:19-cv-02216-DAB

Counsel,

Attached please find copies of the following documents, which have also been sent to you by U.S. Mail.

1. Plaintiffs' First Set of Requests for Production of Documents by Municipal Defendants
1. Plaintiffs' First Set of Requests for Production of Documents by TPT Defendants
2. Plaintiff Dorce's First Set of Interrogatories to Municipal Defendants
3. Plaintiff Dorce's First Set of Interrogatories to TPT Defendants

We would also like to schedule the Rule 26(f) conference. Can you provide us with some times next week when you are available?

Alexander B. Simkin
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Sincerely,

Matthew L. Berman
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Fax: 516-706-0248
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My LinkedIn Profile

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